

From: [Bill Jacobs](#)
To: [Russell Wasem](#)
Cc: [Dan Peacock](#); [Laura Parsons](#)
Subject: Re: Fw: Tamper Resistant Bait Stations Criteria
Date: 02/09/2012 02:02 PM

We have accepted the patio-block arrangement, if the patio blocks used are heavy enough and the method of attachment is strong enough so that the arrangement is consistent with the bait station criteria from PR Notice 94-7 and the placement is consistent with the requirements of the label for the rodenticide bait used in the station.

Such a station securing arrangement is made in and around Potomac Yards South, for the most part. When we first moved here, unsecured stations were placed in the parking garage. Those units often were found to have been moved, often into parking spaces.

▼ Russell Wasem---02/09/2012 12:07:53 PM---Any opinion on: Would the practice of weighting down the bait station be considered "anchored secu

From: Russell Wasem/DC/USEPA/US
To: Laura Parsons/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA
Date: 02/09/2012 12:07 PM
Subject: Fw: Tamper Resistant Bait Stations Criteria

Any opinion on:

Would the practice of weighting down the bait station be considered "anchored securely (per PR Notice 94-7)?"

I do not plan to answer the question below about "glueing" a bait station, as that is entirely too vague and dependent on the type of glue and quality of the affixing job to have an answer to in my opinion.

----- Forwarded by Russell Wasem/DC/USEPA/US on 02/09/2012 12:03 PM -----

From: Marcia Anderson/R2/USEPA/US
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Cc: "Mike McConville" <Mike.McConville@dep.state.nj.us>, "Nancy Santiago" <Nancy.Santiago@dep.state.nj.us>, "Roy Meyer" <Roy.Meyer@dep.state.nj.us>, "John Pitonyak" <John.Pitonyak@dep.state.nj.us>, Adrian Enache/R2/USEPA/US,>
Date: 02/09/2012 11:58 AM
Subject: Fw: Tamper Resistant Bait Stations Criteria

Rusty,
Could you please comment on the observation and question posed by our Region 2 inspectors on the gluing of the bait stations as sufficient anchorage - see below.

Thanks for the help.
Marcia

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----- Forwarded by Marcia Anderson/R2/USEPA/US on 02/09/2012 11:43 AM -----

From: Adrian Enache/R2/USEPA/US
To: Marcia Anderson/R2/USEPA/US@EPA
Date: 02/09/2012 11:03 AM
Subject: Fw: Tamper Resistant Bait Stations Criteria

Please pose this question to Rusty (I forgot his last name); my educated guess is that it would, but...

Thanks.

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Date: 02/09/2012 10:49 AM
Subject: Re: Tamper Resistant Bait Stations Criteria

The bait stations are not anchored with glue to an immovable substrate. The applicators are gluing the bait stations to patio blocks that are then placed on the ground. My question is, does the added weight of the patio block fulfill the requirement of (PR) Notice 94-7 which states in part:
"2. strong enough to prohibit entry or destruction by dogs and by children under six years of age using their hands, their feet, or objects commonly